

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA )  
                                  )  
                                  )  
                                  ) NO. 1:24-cr-10281-IT  
v. )  
                                  )  
                                  )  
                                  )  
JOAN AVALO-QUEZADA )

**MOTION FOR WITHDRAWAL OF COUNSEL AND TO APPOINT NEW COUNSEL**

Now comes the counsel for the Joan Avalo-Quezada in the above-entitled matter before this Honorable Court, and respectfully moves to withdraw from further representation of Mr. Avalo-Quezada. As reasons and grounds therefore, counsel states that there has been an irretrievable break down in the attorney-client relationship. The defendant has been deemed to qualify for court appointed counsel. Instant counsel requests that this Court allow him to withdraw his appearance and appoint new counsel to represent Mr. Avalo-Quezada.

Respectfully Submitted,

Counsel for the defendant,

*/s/ Jason Benzaken*

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Dated: February 24, 2025

**Certificate of Service**

I hereby certify that a copy of this motion has been served upon the parties to this matter and counsel for the United States through CM/ECF.

*/s/ Jason Benzaken*

Dated: February 24, 2025